

HONORABLE THOMAS S. ZILLY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

HUNTERS CAPITAL, LLC, et al.,

Plaintiffs,

v.

CITY OF SEATTLE,

Defendant.

Case No. 20-cv-00983-TSZ

CITY OF SEATTLE'S ANSWER
TO THIRD AMENDED CLASS
ACTION COMPLAINT

The City of Seattle (City), by and through its undersigned attorneys of record, hereby answers Plaintiffs' Third Amended Class Action Complaint as follows.

I. OVERVIEW

1. The City admits that the United States Constitution states what is stated therein. The City lacks sufficient information to admit or deny the allegations in the second and third sentences of paragraph 1 and therefore denies them.

2. The City lacks sufficient information to admit or deny the allegations in the first and second sentences of paragraph 2 and therefore denies them. The City denies the allegations in the third sentence of paragraph 2.

3. The City denies the allegations of paragraph 3.

4. The City denies the allegations of paragraph 4.

13. The City lacks sufficient information to admit or deny the characterizations of the plaintiffs in paragraph 13 and therefore denies them. The City denies the remainder of paragraph 13.

19. The City lacks sufficient information to admit or deny the allegations in paragraph

19 and therefore denies them.

20. The City lacks sufficient information to admit or deny the allegations in paragraph 20 and therefore denies them.

21. The City lacks sufficient information to admit or deny the allegations in paragraph 21 and therefore denies them.

22. The City lacks sufficient information to admit or deny the allegations in paragraph 22 and therefore denies them.

23. The City lacks sufficient information to admit or deny the allegations in paragraph 23 and therefore denies them.

24. The City lacks sufficient information to admit or deny the allegations in paragraph 24 and therefore denies them.

25. The City lacks sufficient information to admit or deny the allegations in paragraph 25 and therefore denies them.

26. The City lacks sufficient information to admit or deny the allegations in paragraph 26 and therefore denies them.

27. The City lacks sufficient information to admit or deny the allegations in paragraph 27 and therefore denies them.

28. The City lacks sufficient information to admit or deny the allegations in paragraph 28 and therefore denies them.

29. The City lacks sufficient information to admit or deny the allegations in paragraph 29 and therefore denies them.

30. The City lacks sufficient information to admit or deny the allegations in paragraph 30 and therefore denies them.

31. The City lacks sufficient information to admit or deny the allegations in paragraph 31 and therefore denies them.

32. The City lacks sufficient information to admit or deny the allegations in paragraph 32 and therefore denies them.

33. The City admits that the City of Seattle is a municipality within the State of Washington, that the Seattle Police Department is a department of the City, that Jenny Durkan is the Mayor of the City, that the Mayor of the City is the chief executive officer of the City, and that the Mayor of the City is a policymaker for the City, and denies the remaining allegations of paragraph 33.

III. JURISDICTION AND VENUE

34. Paragraph 34 states legal conclusions to which no response is required.

35. Paragraph 35 states legal conclusions to which no response is required.

IV. FACTUAL ALLEGATIONS

36. The City denies the allegations of paragraph 36.

37. The City admits that it used barriers in managing the Cal Anderson Park area during June 2020 and otherwise denies the allegations of paragraph 37.

38. The City denies the allegations of paragraph 38.

39. The City admits that during June 2020 some people called the Cal Anderson Park area Free Capitol Hill, CHAZ, and CHOP and otherwise denies the allegations of paragraph 39.

40. The City admits that the area referred to as the CHOP was bounded approximately by East Denny Way, 13th Avenue, East Pike Street, and Broadway and that Cal Anderson Park and sixteen city blocks are within that area, and otherwise denies the allegations of paragraph 40.

41. The City denies the allegations of paragraph 41.

42. The City denies the allegations of paragraph 42.

43. The City admits that during June 2020 there were tents on some streets, sidewalks, and Cal Anderson Park, lacks sufficient information to admit or deny whether the photographs depict what they are claimed to depict and therefore denies the same, and otherwise denies the

1 allegations of paragraph 43.

2 44. The City admits that during June 2020 persons painted graffiti on surfaces in the
3 Cal Anderson Park area and that during June 2020 some property owners and the City removed or
4 painted over graffiti on surfaces in the Cal Anderson Park area, lacks sufficient information to
5 admit or deny whether some business owners were threatened with retaliation and therefore denies
6 the same, lacks sufficient information to admit or deny whether the photographs depict what they
7 are claimed to depict and therefore denies the same, and otherwise denies the allegations of
8 paragraph 44.

9 45. The City admits that persons sold food and other items during the time and in the
10 area at issue, but otherwise denies the allegations of paragraph 45.

11 46. The City lacks sufficient information to admit or deny the allegations in paragraph
12 46 and therefore denies the same.

13 47. The City lacks sufficient information to admit or deny that persons demanded
14 business owners release individuals who were caught committing crimes or that persons attempted
15 to perform their own crime investigations and therefore denies the same, and otherwise denies the
16 allegations of paragraph 47.

17 48. The City admits that speeches, debates, movies, music, and various other activities
18 occurred during the time and in the area at issue, but otherwise denies the allegations of paragraph
19 48.

20 49. The City lacks sufficient information to admit or deny the allegations in paragraph
21 49 and therefore denies the same.

22 50. The City admits that Cal Anderson Park was within the area described by some
23 persons as the CHOP, is approximately 7 acres in area, and is owned by the City. The City admits
24 that the City provided hand-washing stations and portable toilets during the time and in the area at
25 issue. The City otherwise denies the allegations in paragraph 50.

1 51. The City denies the allegations in paragraph 51 and lacks sufficient information to
2 admit or deny whether the photographs depict what they are claimed to depict and therefore denies
3 the same.

4 52. The City lacks sufficient information to admit or deny whether local residents were
5 threatened and therefore denies that allegation, lacks sufficient information to admit or deny
6 whether the photographs depict what they are claimed to depict and therefore denies the same, and
7 otherwise denies the allegations in paragraph 52.

8 53. The City admits that persons planted gardens in Cal Anderson Park during the time
9 at issue, lacks sufficient information to admit or deny whether the photographs depict what they
10 are claimed to depict and therefore denies the same, and otherwise denies the allegations in
11 paragraph 53.

12 54. The City lacks sufficient information to admit or deny whether any of plaintiffs'
13 properties overlook, border, or are adjacent to Cal Anderson Park or to admit or deny what
14 plaintiffs saw and therefore denies the same, and otherwise denies the allegations in paragraph 54.

15 55. The City lacks sufficient information to admit or deny the allegations in paragraph
16 55 and therefore denies the same.

17 56. The City denies the allegations in paragraph 56.

18 57. The City denies the allegations in paragraph 57.

19 58. The City admits that Seattle Police Department Chief Carmen Best said what she
20 said and otherwise denies the allegations in paragraph 58.

21 59. The City denies the allegations in paragraph 59.

22 60. The City admits that two persons were shot in the approximate area and during the
23 approximate time specified, that one of the persons shot died and that no persons have been
24 criminally charged as perpetrators of the shootings. The City otherwise denies the allegations in
25 paragraph 60.

1 61. The City admits that the video purports to show what it purports to show, but
2 otherwise denies the allegations in paragraph 61.

3 62. The City admits that a person was shot in the approximate area and during the
4 approximate time specified, lacks sufficient information to admit or deny how the person was
5 transported and therefore denies the same, and otherwise denies the allegations in paragraph 62.

6 63. The City admits that Seattle Police Department Chief Carmen Best said what she
7 said and otherwise denies the allegations in paragraph 63.

8 64. The City admits that two persons were shot in the approximate area and during the
9 approximate time specified and that one of the people who was shot died, and lacks sufficient
10 information to admit or deny the condition of the second person and therefore denies the same.
11 The City otherwise denies the allegations in paragraph 64.

12 65. The City lacks sufficient information to admit or deny the allegations in paragraph
13 65 and therefore denies the same.

14 66. The City lacks sufficient information to admit or deny how the persons were
15 transported and therefore denies the same, and otherwise denies the allegations in paragraph 66.

16 67. The City admits that the SPD blotter said what it said and that no persons have been
17 criminally charged as perpetrators of the shooting. The City otherwise denies the allegations of
18 paragraph 67.

19 68. The City lacks sufficient information to admit or deny the allegations in paragraph
20 68 and therefore denies the same.

21 69. The City admits that two persons died after being shot in the approximate area and
22 at the approximate time at issue. The City is without sufficient information to admit or deny the
23 remaining information in paragraph 69, in part because the City does not know how plaintiffs
24 define the boundaries of “the Capitol Hill neighborhood.”

25 70. The City denies the allegations in paragraph 70.

1 71. The City denies the allegations in paragraph 71.

2 72. The City denies the allegations in paragraph 72.

3 73. The City denies the allegations in paragraph 73.

4 74. The City denies the allegations in paragraph 74.

5 75. The City denies the allegations in paragraph 75.

6 76. The City denies the allegations in paragraph 76.

7 77. The City denies the allegations in paragraph 77.

8 78. The City denies the allegations in paragraph 78.

9 79. The City denies the allegations in paragraph 79.

10 80. The City admits that Seattle Police Department Chief Carmen Best said what she
11 said and otherwise denies the allegations in paragraph 80.

12 81. The City denies the allegations in paragraph 81.

13 82. The City denies the allegations in paragraph 82.

14 83. The City denies the allegations in paragraph 83.

15 84. The City lacks sufficient information to admit or deny the allegations in paragraph
16 84 and therefore denies the same.

17 85. The City denies the first, second, and fifth sentences of paragraph 85. The City
18 lacks sufficient information to admit or deny the remaining allegations of paragraph 85 and
19 therefore denies the same.

20 86. The City lacks sufficient information to admit or deny the allegations paragraph 86
21 and therefore denies the same.

22 87. The City denies the last sentence of paragraph 87. The City lacks sufficient
23 information to admit or deny the remaining allegations of paragraph 87 and therefore denies the
24 same.

25 88. The City lacks sufficient information to admit or deny the allegations of paragraph

1 88 and therefore denies the same.

2 89. The City lacks sufficient information to admit or deny the allegations of paragraph
3 89 and therefore denies the same.

4 90. The City lacks sufficient information to admit or deny the allegations of paragraph
5 90 and therefore denies the same.

6 91. The City lacks sufficient information to admit or deny the allegations of paragraph
7 91 and therefore denies the same.

8 92. The City lacks sufficient information to admit or deny the allegations of paragraph
9 92 and therefore denies the same.

10 93. The City denies the allegations in paragraph 93.

11 94. The City lacks sufficient information to admit or deny the allegations of paragraph
12 94 and therefore denies the same.

13 95. The City lacks sufficient information to admit or deny the allegations of paragraph
14 95 and therefore denies the same.

15 96. The City denies the allegations in paragraph 96.

16 97. The City lacks sufficient information to admit or deny the allegations of paragraph
17 97 and therefore denies the same.

18 98. The City lacks sufficient information to admit or deny the allegations of paragraph
19 98 and therefore denies the same.

20 99. The City lacks sufficient information to admit or deny the allegations of paragraph
21 99 and therefore denies the same.

22 100. The City lacks sufficient information to admit or deny the allegations of paragraph
23 100 and therefore denies the same.

24 101. The City denies the allegations in paragraph 101.

25 102. The City lacks sufficient information to admit or deny the allegations of paragraph

102 and therefore denies the same.

103. The City lacks sufficient information to admit or deny the allegations of paragraph 103 and therefore denies the same.

104. The City lacks sufficient information to admit or deny the allegations of paragraph 104 and therefore denies the same.

105. The City lacks sufficient information to admit or deny the allegations of paragraph 105 and therefore denies the same.

106. The City lacks sufficient information to admit or deny the allegations of paragraph 106 and therefore denies the same.

107. The City denies that it ignored anyone's concerns. The City lacks sufficient information to admit or deny the remaining allegations of paragraph 107 and therefore denies the same.

108. The City admits that Capitol Hill is a diverse neighborhood, that it is known for its minority presence and as a center for Seattle's LGBTQ+ community, and that many small business owners in the area are minority owned. The City otherwise denies the allegations in paragraph 108.

109. The City lacks sufficient information to admit or deny the allegations of paragraph 109 and therefore denies the same.

110. The City lacks sufficient information to admit or deny the allegations of paragraph 110 and therefore denies the same.

111. The City denies that the actions it took constituted "support" for the CHOP. The City lacks sufficient information to admit or deny the remaining allegations of paragraph 111 and therefore denies the same.

112. The City admits that it provided hand-washing stations and portable toilets in the area and during the time at issue. The City denies the remaining allegations in paragraph 112.

1 113. The City lacks sufficient information to admit or deny the allegations of paragraph
2 113 and therefore denies the same.

3 114. The City lacks sufficient information to admit or deny the allegations of paragraph
4 114 and therefore denies the same.

5 115. The City lacks sufficient information to admit or deny the allegations of paragraph
6 115 and therefore denies the same.

7 116. The City lacks sufficient information to admit or deny the allegations of paragraph
8 116 and therefore denies the same.

9 117. The City lacks sufficient information to admit or deny the allegations of paragraph
10 117 and therefore denies the same.

11 118. The City lacks sufficient information to admit or deny the allegations of paragraph
12 118 and therefore denies the same.

13 119. The City lacks sufficient information to admit or deny the allegations of paragraph
14 119 and therefore denies the same.

15 120. The City lacks sufficient information to admit or deny the allegations of paragraph
16 120 and therefore denies the same.

17 121. The City lacks sufficient information to admit or deny the allegations of paragraph
18 121 and therefore denies the same.

19 122. The City lacks sufficient information to admit or deny the allegations of paragraph
20 122 and therefore denies the same.

21 123. The City lacks sufficient information to admit or deny the allegations of paragraph
22 123 and therefore denies the same.

23 124. The City lacks sufficient information to admit or deny the allegations of paragraph
24 124 and therefore denies the same.

25 125. The City lacks sufficient information to admit or deny the allegations of paragraph

1 125 and therefore denies the same.

2 126. The City lacks sufficient information to admit or deny the allegations of paragraph
3 126 and therefore denies the same.

4 127. The City lacks sufficient information to admit or deny the allegations of paragraph
5 127 and therefore denies the same.

6 128. The City denies that the City is responsible for any losses and otherwise lacks
7 sufficient information to admit or deny the allegations of paragraph 128 and therefore denies the
8 same.

9 129. The City lacks sufficient information to admit or deny the allegations of paragraph
10 129 and therefore denies the same.

11 130. The City lacks sufficient information to admit or deny the allegations of paragraph
12 130 and therefore denies the same.

13 131. The City lacks sufficient information to admit or deny the allegations of paragraph
14 131 and therefore denies the same.

15 132. The City admits that the identified writing says what it says but otherwise denies the
16 allegations of paragraph 132.

17 133. The City lacks sufficient information to admit or deny the allegations of paragraph
18 133 and therefore denies the same.

19 134. The City lacks sufficient information to admit or deny the allegations of paragraph
20 134 and therefore denies the same.

21 135. The City lacks sufficient information to admit or deny the allegations of paragraph
22 135 and therefore denies the same.

23 136. The City denies that the City enabled lawlessness and otherwise lacks sufficient
24 information to admit or deny the allegations of paragraph 136 and therefore denies the same.

25 137. The City lacks sufficient information to admit or deny the allegations of paragraph

137 and therefore denies the same.

138. The City lacks sufficient information to admit or deny the allegations of paragraph 138 and therefore denies the same.

139. The City lacks sufficient information to admit or deny the allegations of paragraph 139 and therefore denies the same.

140. The City lacks sufficient information to admit or deny the allegations of paragraph 140 or that the photograph depicts what it is claimed to depict and therefore denies the same.

141. The City denies the first sentence of paragraph 141. The City lacks sufficient information to admit or deny the remaining allegations of paragraph 141 and therefore denies the same.

142. The City lacks sufficient information to admit or deny the allegations of paragraph 142 and therefore denies the same.

143. The City lacks sufficient information to admit or deny the allegations of paragraph 143 and therefore denies the same.

144. The City denies that it is responsible for the losses plaintiffs allege. The City lacks sufficient information to admit or deny the remaining allegations of paragraph 144 and therefore denies the same.

145. The City admits the first sentence of paragraph 145. The City denies the remaining allegations in paragraph 145.

146. The City denies that it “supported the ongoing occupation of CHOP.” The City lacks sufficient information to admit or deny the remaining allegations of paragraph 146 and therefore denies the same.

147. The City lacks sufficient information to admit or deny the allegations of paragraph 147 and therefore denies the same.

148. The City admits that Hunters Capital wrote to the City but denies the remainder of

1 the last sentence of paragraph 148. The City lacks sufficient information to admit or deny the
2 remaining allegations of paragraph 148 and therefore denies the same.

3 149. The City lacks sufficient information to admit or deny the allegations of paragraph
4 149 and therefore denies the same.

5 150. The City lacks sufficient information to admit or deny the allegations of paragraph
6 150 and therefore denies the same.

7 151. The City lacks sufficient information to admit or deny the allegations of paragraph
8 151 and therefore denies the same.

9 152. The City lacks sufficient information to admit or deny the allegations of paragraph
10 152 and therefore denies the same.

11 153. The City lacks sufficient information to admit or deny the allegations of paragraph
12 153 and therefore denies the same.

13 154. The City lacks sufficient information to admit or deny the allegations of paragraph
14 154 and therefore denies the same.

15 155. The City lacks sufficient information to admit or deny the allegations of paragraph
16 155 and therefore denies the same.

17 156. The City denies the allegations in paragraph 156.

18 157. The City lacks sufficient information to admit or deny the allegations of paragraph
19 157 and therefore denies the same.

20 158. The City lacks sufficient information to admit or deny the allegations of paragraph
21 158 and therefore denies the same.

22 159. The City denies that it is responsible for the damages plaintiffs allege. The City
23 lacks sufficient information to admit or deny the remaining allegations of paragraph 159 and
24 therefore denies the same.

25 160. The City lacks sufficient information to admit or deny the allegations of paragraph

1 160 and therefore denies the same.

2 161. The City lacks sufficient information to admit or deny the allegations of paragraph
3 161 and therefore denies the same.

4 162. The City lacks sufficient information to admit or deny the allegations of paragraph
5 162 and therefore denies the same.

6 163. The City lacks sufficient information to admit or deny the allegations of paragraph
7 163 and therefore denies the same.

8 164. The City lacks sufficient information to admit or deny the allegations of paragraph
9 164 and therefore denies the same.

10 165. The City lacks sufficient information to admit or deny the allegations of paragraph
11 165 and therefore denies the same.

12 166. The City denies the allegations in paragraph 166.

13 167. The City admits that persons said what they said, that the City stated what it stated,
14 and that Mayor Durkan personally visited the area at issue during the time period at issue. The
15 City otherwise denies the allegations in paragraph 167.

16 168. The City admits that Mayor Durkan's order effective July 1, 2020, states what it
17 states. The City otherwise denies the allegations in paragraph 168.

18 169. The City denies the allegations in paragraph 169.

19 170. The City denies the allegations in paragraph 170.

20 171. The City denies the allegations in paragraph 171.

21 172. The City denies the allegations in paragraph 172.

22 173. The City denies the allegations in paragraph 173.

23 174. The City admits that persons said what they said and that the City stated what it
24 stated. The City denies the remaining allegations in paragraph 174.

25 175. The City admits that persons said what they said and that the City stated what it

1 stated. The City denies the remaining allegations in paragraph 175.

2 176. The City denies the allegations in paragraph 176.

3 177. The City denies the allegations in paragraph 177.

4 **V. CLASS ALLEGATIONS**

5 178. The City admits that the plaintiffs seek what they seek.

6 179. The City admits that the plaintiffs seek what they seek.

7 180. The City denies the allegations in paragraph 180.

8 181. The City denies the allegations in paragraph 181.

9 182. The City denies the allegations in paragraph 182.

10 183. The City denies the allegations in paragraph 183.

11 184. The City denies the allegations in paragraph 184.

12 185. The City denies the allegations in paragraph 185.

13 186. The City denies the allegations in paragraph 186.

14 187. The City denies the allegations in paragraph 187.

15 **VI. CLAIM FOR RELIEF**

16 **FIRST CAUSE OF ACTION – PROCEDURAL DUE PROCESS**

17 188. The City responds to each allegation as it responded before.

18 189. Paragraph 189 states legal conclusions to which no response is required.

19 190. The City denies the allegations in paragraph 190.

20 191. Paragraph 191 states legal conclusions to which no response is required.

21 192. The City denies the allegations in paragraph 192.

22 193. The City denies the allegations in paragraph 193.

23 194. The City denies the allegations in paragraph 194.

24 195. The City denies the allegations in paragraph 195.

25 196. The City denies the allegations in paragraph 196.

SECOND CAUSE OF ACTION – SUBSTANTIVE DUE PROCESS

197. The City responds to each allegation as it responded before.
198. Paragraph 198 states legal conclusions to which no response is required.
199. The City denies the allegations in paragraph 199.
200. The City denies the allegations in paragraph 200.
201. The City denies the allegations in paragraph 201.
202. The City denies the allegations in paragraph 202.

THIRD CAUSE OF ACTION – TAKING

203. The City responds to each allegation as it responded before.
204. Paragraph 204 states legal conclusions to which no response is required.
205. The City denies the allegations in paragraph 205.
206. The City denies the allegations in paragraph 206.
207. The City denies the allegations in paragraph 207.
208. The City denies the allegations in paragraph 208.

FOURTH CAUSE OF ACTION – NEGLIGENCE

209. The City responds to each allegation as it responded before.
210. The City denies the allegations in paragraph 210.
211. The City denies the allegations in paragraph 211.
212. The City denies the allegations in paragraph 212.
213. The City denies the allegations in paragraph 213.
214. The City denies the allegations in paragraph 214.
215. The City denies the allegations in paragraph 215.

FIFTH CAUSE OF ACTION – NUISANCE

216. The City responds to each allegation as it responded before.
217. The City denies the allegations in paragraph 217.

218. The City denies the allegations in paragraph 218.

219. The City denies the allegations in paragraph 219.

220. The City denies the allegations in paragraph 220.

221. The City denies the allegations in paragraph 221.

222. The City denies the allegations in paragraph 222.

VII. JURY DEMAND

The City acknowledges the plaintiffs' demand for a trial by jury.

VIII. PRAYER FOR RELIEF

No answer is required to the plaintiffs' prayer for relief.

AFFIRMATIVE AND OTHER DEFENSES

Without assuming any burden it would not otherwise bear, the City asserts the following affirmative and other defenses.

1. Plaintiffs and putative class members fail to state a claim upon which relief may be granted.

2. The claims of plaintiffs and putative class members may be barred, in whole or in part, by application of the doctrine of discretionary immunity.

3. The claims of plaintiffs and putative class members may be barred, in whole or in part, by application of the public duty doctrine.

4. The damages of plaintiffs and putative class members, if any, may have been caused or contributed to by the fault of other entities or persons, some of whose identities may never be determined but whose actions are outlined in the plaintiffs' complaint.

5. The damages of plaintiffs and putative class members, if any, may be reduced for failure to take reasonable steps to mitigate damages.

6. The claims of plaintiffs and putative class members may be barred, in whole or in part, by their contributory fault or contributory negligence.

7. The claims of plaintiffs and putative class members may be barred, in whole or in part, by their assumption of risk.

8. The claims of plaintiffs and putative class members are barred for failure to give timely notice of a tort claim before commencing the action.

9. Plaintiffs Onxy Homeowners Association, Madrona Real Estate Services LLC, Madrona Real Estate Investors IV LLC, Madrona Real Estate Investors VI LLC, 12th and Pike Associates LLC, Hunters Capital, LLC, Olive ST Apartments LLC, and Redside Partners LLC lack standing to sue for damages allegedly incurred by the tenants, residents, and owners in the buildings they manage and / or own.

DATED this 16th day of July, 2021.

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